

# **EXHIBIT L**

**(REDACTED VERSION OF DOCUMENT  
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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

ORACLE AMERICA, INC., )  
Plaintiff, ) Case No.  
vs. ) CV 10-03561 WHA  
GOOGLE, INC., )  
Defendant. )  
 ) VOLUME I

HIGHLY CONFIDENTIAL - ATTORNEYS' EYES ONLY  
VIDEOTAPED 30 (b) (6) DEPOSITION OF GOOGLE, INC.

DESIGNEE: FELIX LIN

Palo Alto, California

Monday, December 14, 2015

Reported by:

KELLI COMBS, CSR No. 7705

Job No. 2196295

Pages 1 - 184

1                   Do you understand that?

2           A    Yes.

3           Q    All right.

4                   And although it can be sometimes difficult  
5 because everybody wants to get this over with, if  
6 you wait until I finish my questions before you give  
7 your answers so that we're not talking over each  
8 other, and I'll commit to you to do the same. That  
9 will also make it easier for the court reporter.

10                  Do you understand?

11           A    Yes.

12           Q    All right.

13                  You'll have an opportunity to review the  
14 transcript that is prepared after the deposition,  
15 make revisions to any answers that you think require  
16 correction. But if you do change your answers in  
17 some material way, then I may have the opportunity  
18 to comment on that before the jury as to your  
19 credibility.

20                  Do you understand that?

21           A    Yes.

22           Q    All right.

23                  By whom are you presently employed?

24           A    Google.

25           Q    Anyone else?

1 A No.

2 Q And what is your current title with  
3 Google?

4 A Director of Product Management.

5 Q What are your general duties and  
6 responsibilities as a Director of Product Management  
7 at Google?

8 A Today, I primarily work with hardware  
9 partners, folks like Acer and others, who are  
10 building hardware built on Google's operating system  
11 platforms.

12 Q Which operating system platforms?

13 A Chrome OS and Android.

14 Q When did you join Google?

15 A April of 2009.

16 Q And what was your title at that time?

17 A Group Product Manager.

18 Q And what product or products --

19 For which product or products did you have  
20 responsibility when you joined Google?

21 A Chrome OS.

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25

1 very beginning, and just last year about this time,  
2 I picked up responsibility for Android Partner  
3 Engineering.

4 Q When you joined Google, was there a  
5 Chrome OS?

6 A No. The product had not been announced  
7 yet.

8 Q Was it being worked on at the time?

9 MR. RAGLAND: I'll object to outside the  
10 scope of the 30(b)(6) topics on which Mr. Lin is  
11 presented.

12 But you may answer.

13 THE WITNESS: Sure. We were in the  
14 initial discussions about getting the project  
15 started.

16 BY MS. HURST:

17 Q So you were there from the very beginning  
18 with Chrome OS?

19 A There were some conversations that were --  
20 that had taken place before I had gotten there.

21 Q Had the decision yet been made to go  
22 forward in creating Chrome OS?

23 A No.

24 MR. RAGLAND: Same objection. Outside the  
25 scope.

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15 BY MS. HURST:

16 Q How long has ARC Welder been in existence?

17 MR. RAGLAND: Objection to form, outside  
18 the scope.

19 THE WITNESS: I can't recall exactly how  
20 long, but it seems within the last year.

21 BY MS. HURST:

22 Q Would you say that's a relatively new  
23 effort?

24 A Yes.

25 MR. RAGLAND: Same objections.

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23 BY MS. HURST:

24 Q Would you agree that major platform  
25 providers in the marketplace are working towards the

1 goal of having a unified experience for their  
2 consumers across all devices?

3 MR. RAGLAND: Objection to form, outside  
4 the scope of the noticed topics.

5 THE WITNESS: Could you ask the question  
6 again?

7 BY MS. HURST:

8 Q Sure.

9 Would you agree that the major platform  
10 providers in the marketplace are working towards the  
11 goal of having a unified experience for their  
12 consumers across all devices?

13 MR. RAGLAND: Same objections.

14 THE WITNESS: Which companies are you  
15 thinking about?

16 BY MS. HURST:

17 Q Well, let's take Apple as an example,  
18 Microsoft as an example.

19 MR. RAGLAND: Same objections.

20 THE WITNESS: It's hard for me to talk  
21 about strategies of other companies. If you're  
22 asking as a consumer what am I seeing, I can answer  
23 that.

24 BY MS. HURST:

25 Q All right. And how would you?

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22 Q Does the Chrome OS have a set of developer  
23 APIs?

24 MR. RAGLAND: Objection to form, outside  
25 the scope.

1                   THE WITNESS: Chrome OS makes use of all  
2 of the Web APIs for developing applications with  
3 HTML5 and JavaScript.

4 BY MS. HURST:

5                   Q      Other than HTML5 and JavaScript, are there  
6 any other developer-oriented APIs associated with  
7 Chrome OS?

8                   MR. RAGLAND: Same objections.

9                   THE WITNESS: We allow people to write  
10 applications in native languages like C using a  
11 facility called Native Client.

12 BY MS. HURST:

13                   Q      And is that Native Client associated with  
14 some other platform?

15                   MR. RAGLAND: Objection to form and  
16 outside the scope.

17                   THE WITNESS: What -- what other  
18 platforms?

19 BY MS. HURST:

20                   Q      Well, for example, the JNI interface as  
21 part of the Java platform is a way of allowing  
22 people to integrate applications written in native  
23 languages.

24                   Are you using --

25                   A      We don't support Java on Chrome OS.

MR. RAGLAND: We've been going about an hour. When it's a convenient time for a break...

MS. HURST: Just a few moments and I'll be ready.

MR. RAGLAND: That's fine.

BY MS. HURST:

Q So the Native Client that you mentioned, is that associated with JavaScript? What's it associated with?

MR. RAGLAND: Objection to form and outside the scope.

THE WITNESS: It's associated with C primarily, C++.

BY MS. HURST:

Q      And is that -- is that built into  
Chrome OS, that Native Client capability?

MR. RAGLAND: Same objections.

THE WITNESS: Yes.

MS. HURST: All right. This is a convenient time if you'd like a break.

MR. RAGLAND: Thank you.

THE VIDEOGRAPHER: Going off the record.  
The time is 10:57.

(Recess taken.)

THE VIDEOGRAPHER: We're back on the

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1 Q And is it your understanding that you are  
2 proffered here by Google to testify today on some  
3 portion of Topic 3?

4 A Yes.

5 Q And -- and using your own words, what's  
6 your understanding of that aspect of Topic 3 that  
7 you're to cover?

8 A Just exactly what it says here: The  
9 purpose and operation of Google Play Services for  
10 what it is and how it's used.

11 Q All right.

12 MR. RAGLAND: Actually, if I could refer  
13 back to the discussions we've had among counsel as  
14 to the scope of Topic 3, we're presenting Mr. Lin on  
15 the aspect of Topic 3 related to licensing,  
16 marketing, advertising or distribution of Google  
17 Play Services.

18 BY MS. HURST:

19 Q All right.

20 Did you hear that proffer by your counsel,  
21 Mr. Lin?

22 A I did.

23 Q And do you consent to testify here today  
24 on behalf of Google, Inc. regarding the licensing,  
25 marketing, advertising or distribution of Google

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1 Play Services?

2 A Yes.

3 MS. HURST: Do you want to make a similar  
4 proffer with respect to Topic 4, Mr. Ragland?

5 MR. RAGLAND: No.

6 MS. HURST: So it's all of Topic 4,  
7 correct?

8 MR. RAGLAND: All of Topic 4. There is a  
9 limitation on Topic 5. We can get to that whenever  
10 you like.

11 MS. HURST: All right.

12 BY MS. HURST:

13 Q So, Mr. Lin, you heard Mr. Ragland state  
14 that you're being offered to testify on all of  
15 Topic 4, true?

16 A Uh-huh.

17 Q Yes?

18 A Yes.

19 BY MS. HURST:

20 Q Thanks.

21 And do you consent to testify on Topic 4  
22 on behalf of Google?

23 A Yes.

24 MS. HURST: All right. Mr. Ragland, do  
25 you want to make your designation with respect to

1 Topic 5?

2 MR. RAGLAND: Sure. As to Topic Number 5,  
3 Mr. Lin is designated to testify as to mobile  
4 agreements with OEMs or carriers regarding Google  
5 services on non-Android devices. And by "Google  
6 services," that's defined as Google Mobile Services  
7 and Google Play Services.

8 MS. HURST: Well, I'm not sure that's how  
9 we defined it. I think it was broader than that,  
10 but that's all right. I think we understood the  
11 designation on Topic 5 to be broader than that based  
12 on the prior correspondence. I'm not sure there's  
13 much we can do about that right now.

14 BY MS. HURST:

15 Q You've heard, Mr. Lin, your counsel's  
16 proffer as to your designation on Topic 5?

17 A Yes.

18 Q And do you consent to testify on behalf of  
19 Google with respect to Topic 5 as identified by your  
20 counsel?

21 A Yes.

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1                   I, the undersigned, a Certified Shorthand  
2 Reporter of the State of California, do hereby certify:

3                   That the foregoing proceedings were taken  
4 before me at the time and place herein set forth; that  
5 any witnesses in the foregoing proceedings, prior to  
6 testifying, were administered an oath; that a record of  
7 the proceedings was made by me using machine shorthand  
8 which was thereafter transcribed under my direction;  
9 that the foregoing transcript is a true record of the  
10 testimony given.

11                  Further, that the foregoing pertains to the  
12 original transcript of a deposition in a Federal Case,  
13 before completion of the proceedings, a review of the  
14 transcript [X] was [ ] was not requested.

15                  I further certify I am neither financially  
16 interested in the action nor a relative or employee of  
17 any attorney or any party to this action.

18                  IN WITNESS WHEREOF, I have this date  
19 subscribed my name.

20  
21                  Dated: 12/16/2015

22  
23                  Kelli Combs

24                  KELLI COMBS

25                  CSR No. 7705